

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF OHIO

IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION

MDL NO. 2804

Civ. No. 1:17-md-02804-DAP

THIS DOCUMENT RELATES TO:

JUDGE POLSTER

*Track One Cases*

**TEVA, CEPHALON AND ACTAVIS GENERIC DEFENDANTS' WITNESS LIST**

Pursuant to Federal Rule of Civil Procedure 26 and the Court's Civil Jury Trial Order (Dkt. 1598), Teva Pharmaceutical Industries LTD, Teva Pharmaceuticals, USA, Inc. (collectively, "Teva Defendants"), Cephalon, Inc., ("Cephalon"), Watson Laboratories, Inc., Actavis LLC, Warner Chilcott Company, LLC, Actavis Pharma, Inc. f/k/a Watson Pharma, Inc., Actavis South Atlantic LLC, Actavis Elizabeth LLC, Actavis Mid Atlantic LLC, Actavis Totowa LLC, Actavis Kadian LLC, Actavis Laboratories UT, Inc. f/k/a Watson Laboratories, Inc. – Salt Lake City, and Actavis Laboratories FL, Inc., f/k/a Watson Laboratories, Inc. (collectively, "Actavis Generic Defendants"), hereby disclose the following witnesses who may testify at trial on their behalf.

In serving this witness list, the Teva, Cephalon and Actavis Generic Defendants specifically reserve the right to amend, supplement, or otherwise modify these disclosures after receipt of the final witness list filed by Plaintiffs. The Teva and Actavis Generic Defendants also reserve the right to supplement and/or to amend their lists with any witnesses identified on any party's witness lists, including any party who later settles or is severed or dismissed. The Teva and Actavis Generic Defendants further reserve the right to supplement and/or to amend this witness list in response to rulings of the Court on pretrial motions. The Teva and Actavis Generic Defendants reserve the right to call any of these witnesses and any witness identified in Defendants' Joint Witness List, either live or by deposition designation. The Teva and Actavis Generic Defendants specifically incorporate by reference the witnesses identified in Defendants' Joint Witness List as if fully set forth herein.

**A. Expert Witnesses**

1. Bruce Bagley, Ph.D., Professor of International Studies at the University of Miami.
  - a) Areas of Testimony: Dr. Bagley is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.
2. Pradeep Chintagunta, Ph.D., Joseph T. and Bernice S. Lewis Distinguished Service Professor of Marketing at the Graduate School of Business at the University of Chicago.
  - a) Areas of Testimony: Dr. Chintagunta is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.
3. Karl Colder, Former Special Agent in Charge of the Washington Field Division, Drug Enforcement Agency
  - a) Areas of Testimony: Dr. Colder is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.

4. Howard Dorfman, Adjunct Professor and Distinguished Practitioner at Seton Hall University School of Law
  - a) Areas of Testimony: Mr. Dorfman is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.
5. Larry N. Holifield, Co-Founder and Director Corporate Integrity Services LLC.

Areas of Testimony: Mr. Holifield is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.
6. Jonathan Ketcham, Ph.D., Earl G. and Gladys C. Davis Distinguished Research Professor in Business at the W.P. Carey School of Business at Arizona State University
  - a) Areas of Testimony: Dr. Ketcham is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.
7. Rob Lyerla, Ph.D. MGIS, Professor in the Interdisciplinary Health Sciences PhD program at Western Michigan University and a former Captain in the U.S. Public Health Service.
  - a) Areas of Testimony: Dr. Lyerla is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.
8. Edward Michna, M.D., Assistant Professor of Anesthesia at Harvard Medical School.
  - a) Areas of Testimony: Dr. Michna is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.
9. Sean Nicholson, Ph.D., Professor in the Department of Policy Analysis and Management and Director of the Sloan Program in Health Administration at Cornell University.
  - a) Areas of Testimony: Dr. Nicholson is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.
10. Shawn Patterson, MBA, Founder of Patterson HCA and Consulting Practice Lead for The Burchfield Group.

- a) Areas of Testimony: Mr. Patterson is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.
- 11. Melanie Rosenblatt, M.D., Medical Director of Pain Management at Pain Management Strategies, Inc. and Medical Director of Acute Pain Management at Holy Cross Hospital.
  - a) Areas of Testimony: Dr. Rosenblatt is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.
- 12. Joseph Tomkiewicz, Teva Diversion Operations Manager
  - a) Areas of Testimony: Mr. Tomkiewicz is expected to testify about the opinions detailed in his expert disclosure and on matters concerning his knowledge, skill, experience, education, and training.

**B. Fact Witnesses**

- 1. Christine Baeder, Teva Chief Operating Officer US Generics
  - a) Areas of Testimony: Ms. Baeder is expected to testify on the topics addressed at her deposition, her duties and responsibilities as the Chief Operating Office for US Generics, the business model for generic manufacturers, the Teva and Actavis Defendants generic business operations and related knowledge.
- 2. Valli Baldassano, Former Cephalon Executive Vice President and Chief Compliance Officer
  - a) Areas of Testimony: Ms. Baldassano will not be called live, and will only be presented through her Responses to Plaintiffs' Deposition by Written Questions.
- 3. Nancy Baran, Former Teva Executive Director, Customer Relations; Former Actavis Executive Director, Customer Relations Operations
  - a) Areas of Testimony: Ms. Baran is expected to testify on the topics addressed at her deposition, her duties and responsibilities as the former Executive Director of Customer Relations at Actavis and Teva and related knowledge.
- 4. Deb Bearer, Teva Senior Director Global Market Access

- a) Areas of Testimony: Ms. Bearer is expected to testify on the topics addressed at her deposition, her duties and responsibilities throughout her career at Teva and related knowledge.
5. Stacey Beckhardt, Former Teva Associate Director, Alliance Development
  - a) Areas of Testimony: Ms. Beckhardt is expected to testify on the topics addressed at her deposition, her duties and responsibilities as an Associate Director of Alliance Development and related knowledge.
6. Doug Boothe, Former Actavis CEO
  - a) Areas of Testimony: Mr. Boothe is expected to testify on the topics addressed at his deposition, his duties and responsibilities as the former CEO of Actavis and related knowledge.
7. Andrew Boyer, Former Teva CEO North America Generics; Former Actavis Sr. VP, Sales and Marketing; Former Watson Sr. VP, Sales & Marketing
  - a) Areas of Testimony: Mr. Boyer is expected to testify on the topics addressed at his deposition, his duties and responsibilities as the former CEO for North America Generics at Teva and the former Sr. VP for Sales and Marketing at Actavis and Watson, the business model for generic manufacturers and related knowledge.
8. Michael Clarke, Former Actavis Vice President Ethics and Compliance
  - a) Areas of Testimony: Mr. Clarke is expected to testify on the topics addressed at his deposition, his duties and responsibilities as the former Vice President for Ethics and Compliance and related knowledge.
9. Cynthia Condodina, Teva Director Training & Development
  - a) Areas of Testimony: Ms. Condodina is expected to testify on the topics addressed at her deposition, her duties and responsibilities as a manager of sales training and product manager and related knowledge.
10. Matthew Day, Former Teva Director of Marketing
  - a) Areas of Testimony: Mr. Day is expected to testify on the topics addressed at his deposition, his duties and responsibilities as the former Director of Marketing, sales manager, and training manager and related knowledge.

11. Michael Dorsey, Teva Director of National Accounts; Former Actavis Director of National Accounts
  - a) Areas of Testimony: Mr. Dorsey is expected to testify on the topics addressed at his deposition, his duties and responsibilities as the Director of National Accounts at Teva and Actavis and related knowledge.
12. Rachelle Galant, Former Actavis Senior Product Manager
  - a) Areas of Testimony: Ms. Galant is expected to testify on the topics addressed at her deposition, her duties and responsibilities as a former Senior Product Manager and related knowledge.
13. Corrine Gillenkirk, Teva Sales Specialist
  - a) Areas of Testimony: Ms. Gillenkirk is expected to testify on the topics addressed at her deposition, her duties and responsibilities as a Sales Specialist and related knowledge.
14. Tricia Glover, Teva Vice President Compliance
  - a) Areas of Testimony: Ms. Glover is expected to testify on the company's current and historic compliance programs, the Corporate Integrity Agreement and implementation of same, her duties and responsibilities as the Vice President of Compliance and related knowledge.
15. Kishore Gopu, Teva Director REMS Operations
  - a) Areas of Testimony: Mr. Gopu is expected to testify about the TIRF REMS program, other REMS programs related to opioid products, his duties and responsibilities as a Director of REMS operations and related knowledge.
16. John Hassler, Teva Senior Vice President & General Manager CNS
  - a) Areas of Testimony: Mr. Hassler is expected to testify on the topics addressed or contemplated to be addressed at his deposition as the 30(b)(6) designee for the Teva Defendants deposition, his duties and responsibilities throughout his career at Teva related to opioid medicines and related knowledge.
17. Tracey Norton (Hernandez), Former Watson Director of Controlled Substance Compliance
  - a) Areas of Testimony: Ms. Hernandez is expected to testify on the topics addressed at her deposition, her duties and responsibilities as

the former Director of Controlled Substance Compliance and related knowledge.

18. Valerie Kaisen (McGinley), Former Teva Sales Specialist
  - a) Areas of Testimony: Ms. Kaisen is expected to testify on the topics addressed at her deposition, her duties and responsibilities as a Sales Specialist and related knowledge.
19. James King, Teva Director Medical Information
  - a) Areas of Testimony: Mr. King is expected to testify on his duties and responsibilities as a Director of Medical Information and related knowledge.
20. Susan Larijani, Teva Senior Director Medical Information
  - a) Areas of Testimony: Ms. Larijani is expected to testify on her duties and responsibilities as the Senior Director of Medical Information and related knowledge.
21. Karen Lowney, Former Teva Senior Director, Compliance
  - a) Areas of Testimony: Ms. Lowney is expected to testify about Teva and Cephalon's compliance programs and her duties and responsibilities as a Senior Director of Compliance and related knowledge.
22. Carole Marchione, Former Teva Director of Regulatory Affairs
  - a) Areas of Testimony: Ms. Marchione is expected to testify on the topics addressed at her deposition, her duties and responsibilities as the former Director of Regulatory Affairs and related knowledge.
23. Jingping McCormick, Former Actavis Director of Marketing
  - a) Areas of Testimony: Ms. McCormick is expected to testify on the topics addressed at her deposition, her duties and responsibilities as the former Director of Marketing and related knowledge.
24. Colleen McGinn, Former Teva Director DEA Compliance
  - a) Areas of Testimony: Ms. McGinn is expected to testify on the topics addressed at her deposition, her duties and responsibilities as the former Director of DEA Compliance and related knowledge.
25. Chris Meyer, Former Teva Director of Sales Operations

- a) Areas of Testimony: Mr. Meyer is expected to testify on his duties and responsibilities as the former Director of Sales Operations and related knowledge.
26. Michael Morreale, Teva Regional Sales Manager
- a) Areas of Testimony: Mr. Morreale is expected to testify on the topics addressed at his deposition, his duties and responsibilities as a Regional Sales Manager and related knowledge.
27. David Myers, Teva Associate Director Marketing; Former Actavis Senior Manager, Products and Communications
- a) Areas of Testimony: Mr. Myers is expected to testify on the topics addressed at his deposition, his duties and responsibilities as an Associate Director of Marketing at Teva and former Senior Manager of Products and Communications at Actavis and related knowledge.
28. Tom Napoli, Former Actavis Associate Director, Controlled Substance Compliance; Former Watson Manager, Security and DEA Affairs
- a) Areas of Testimony: Mr. Napoli is expected to testify on the topics addressed at his deposition, his duties and responsibilities as a former Associate Director of Controlled Substance Compliance at Actavis and Manager of Security and DEA Affairs at Watson, and related knowledge.
29. Michael Perfetto, Former Actavis VP Sales and Marketing
- a) Areas of Testimony: Mr. Perfetto is expected to testify on the topics addressed at his deposition, his duties and responsibilities as the former VP of Sales and Marketing at Actavis and related knowledge.
30. Andy Pyfer, Former Cephalon National Sales Director
- a) Areas of Testimony: Mr. Pyfer is expected to testify on the topics addressed at his deposition, his duties and responsibilities as a former Sales Director and Marketing Director at Cephalon and related knowledge.
31. Laura Sippial, Former Teva Sales Specialist
- a) Areas of Testimony: Ms. Sippial is expected to testify on the topics addressed at her deposition, her duties and responsibilities as a Sales Specialist and related knowledge.



32. Randy Spokane, Former Teva Sales Director
- a) Areas of Testimony: Mr. Spokane is expected to testify on the topics addressed at his deposition, his duties and responsibilities as a former Sales Director, and related knowledge.
33. Joe Tomkiewicz, Teva Diversion Operations Manager
- a) Areas of Testimony: Mr. Tomkiewicz is expected to testify on the topics addressed at his deposition, his duties and responsibilities as the Diversion Operations Manager and related knowledge.
34. Paula Williams, Teva Director Medical Education
- a) Areas of Testimony: Ms. Williams is expected to testify on the topics addressed at her deposition in that matter of the *State of Oklahoma ex rel. Mike Hunter v. Purdue Pharma L.P. et al.*, Case No. CJ-2017-816, her duties and responsibilities the Director of Medical Education and director of marketing and related knowledge.
35. Mary Woods, Allergan Executive Director, Customer Relations Operations; Former Actavis Executive Director, Customer Relations Operations; Former Watson Associate Director, Call Center Operations
- a) Areas of Testimony: Ms. Woods is expected to testify on the topics addressed at her deposition, the Actavis Generic Defendants' SOM programs, her duties and responsibilities as the former Executive Director of Customer Relations Operations at Actavis and Director of Call Center Operation at Watson, and related knowledge.

Dated: September 25, 2019

Respectfully submitted,

/s/ Wendy West Feinstein

Wendy West Feinstein

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**CERTIFICATE OF SERVICE**

I, Wendy West Feinstein, hereby certify that the foregoing **TEVA, CEPHALON AND ACTAVIS GENERIC DEFENDANTS' WITNESS LIST** was filed via the Court's ECF system which will send notification of such filing to all counsel of record.

Dated: September 25, 2019

/s/ Wendy West Feinstein

Wendy West Feinstein